

s/n 10/806,661  
221-0077US**REMARKS**

The specification has been amended to correct two typographical errors.

The Office Action objected to the Abstract of the Disclosure in the specification.

The above amendment to the Abstract is responsive to the objection.

The Office Action rejected claims 1 – 16 under §103(a) as being unpatentable over U.S. Patent No. 6,471,250 (Smith). The Office Action contends that it would be obvious to modify the junction plate disclosed in Smith to include cam surfaces and followers on the second side of the first junction plate.

The Office Action cites *In re Harza* for the proposition that duplicating the components of a prior art device is a design consideration within the skill of the art. But in *Harza*, the CCPA found that the only distinction in the claim at issue was a plurality of ribs on each side of a web of flexible material sealing a joint whereas a prior art reference showed a single rib on each side of the web. 274 F.2d 669, 671

The situation in the subject application is different. The Smith reference does not teach cam surfaces on different sides of a junction plate. Mere duplication of the cam and cam follower of Smith does not lead to the claimed invention which requires a “junction plate having at least two sloped cam surfaces on opposing faces...”

To make out a prima facie case of obviousness, there must be some teaching, suggestion or motivation to modify the disclosure of a cited reference. The Office Action does not cite any such teaching or suggestion. Moreover, there is no motivation to modify the apparatus disclosed in Smith by adding a cam surface to the opposing side of the first junction plate. The Smith reference teaches that the junction plate assembly disclosed therein will separate the faces of the manifold or junctions plates and disengage the couplings.

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One end of the central shaft includes handle 19, which may be used by divers or remote operating vehicles to turn the central shaft and bring the coupling members into engagement, or disengage the coupling members. [col. 3; lines 57-61]

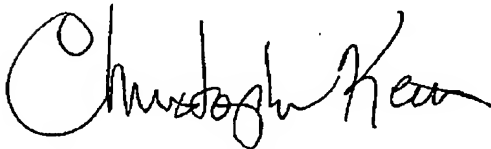
The present invention may be used either manually or by a remote operating vehicle to move the faces of the manifold or junction plates together and engage couplings, or to separate the faces of the manifold or junction plates and disengage the couplings. [col. 4; lines 28-32]

There is no teaching or suggestion in the cited reference of providing mechanical advantage for effecting separation of junction plates.

In summary, the Office Action has not made out a prima facie case of obviousness. Mere duplication of the cam elements disclosed in the cited reference would not lead one skilled in the art to the claimed invention which has sloped cam surfaces on opposing sides of a junction plate.

Reconsideration of the rejection is requested.

Respectfully submitted:



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